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Operable Unit No 1 Report and Formal Presentation To Propose Discontinuing the Collection of Building 881 Footing Drain Water as Part of the Operable Unit No 1 Interim Measure/Interim Remedial Action

Sue Steiger Associate General Manager Environmental Restoration Management EG&G Rocky Flats Inc



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The purpose of this letter is to request EG&G to prepare a report and a presentation proposing to discontinue the collection of the Building 881 Footing Drain water as part of the OU 1 IM/IRA based primarily on a comparison of the collection data to the ARAR s of the IM/IRA Decision Document

A previous request was made in a DOE Memorandum to EG&G on October 12 1993 (Ref ERD RJS 1145) and a completed draft of the report was submitted to DOE on December 8 1993. This draft however did not address the report outline which was presented and discussed by the DOE manager for OU 1 in a meeting with the EG&G OU 1 manager on October 25 1993. The contents of the submitted report is a discussion of Risk Assessment rather than a comparison of the data to the ARARs of the IM/IRA Dicision Document. This report, therefore is not acceptable by DOE. A report similar to the OU 2 Walnut Creek treatability report would be more adequate to present to the regulators as a proposal to discontinue collecting the 881 Footing Drain water.

Attached with this memorandum is a suggested outline for this report. This outline includes brief descriptions of items which DOE feels are important to get this proposed action accepted by the regulators. A meeting will be scheduled by the DOE OU 1 manager and the EG&G OU 1 manager to discuss this outline and to set a schedule

It should be noted that this action is important because the Building 881 Footing Drain water constitutes the major influent volume and therefore is a major cost in operating the IM/IRA Water Treatment Facility for OU 1 In the past EG&G should have taken a greater initiative to effect such a significant cost savings

We believe that this request is within the scope of current work packages If you find that it is not please initiate the appropriate actions through change control

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**ADMIN RECORD** 

If you have any questions please contact Tim Reeves of my staff at extension 7530 or Scott Grace my staff at extension 7199 respectively

-Martin H. McBride

Acting Assistant Manager for Environmental Restoration

### Attachment

cc w/o Attachment A Rampertaap EM 453 S Grace ER RFO J Pepe ER RFO CPAF File

cc w/ Attachment
T Reeves ER RFO
R Houk EG&G
M Burmeister EG&G
W Busby EG&G

## Report Suggested Outline Discontinuation of Collection of 881 Footing Drain

## 1 Executive Summary

Brief summary of the entire report including all conclusions and recommendations

#### 2 Introduction

Include a brief summary of the IM/IRA

Clearly state the purpose of the report and the proposal being made

Briefly outline the report contents

## 3 Background

Include a discussion of what led to the construction of the treatment facility including preliminary data political pressures etc

Present, summarize and discuss data from the IM/IRA Decision Document, including presentation and discussion of all data collected prior to the construction of the treatment facility (use data tables and time series plots of concentration vs. time where appropriate)

Include discussions comparing data to the ARAR s in the IM/IRA Decision Document and any new requirements imposed on the plant.

Include discussions comparing data to the background data for alluvial ground water

Discuss preliminary risk calculations based on these numbers if possible

### 4 Evaluation of New Data

Present summarize and discuss new data that has been obtained since the IM/IRA Treatment Facility

Include discussions comparing data to the ARAR s in the Decision Document and to background data for alluvial ground water

Again include tables and plots of concentration vs time where appropriate

Include a discussion of risk calculations based on these numbers

Include discussion regarding the problems in diluting the water from the other two sources and costs of treating this water possibly illustrating the quantity of the contaminants removed vs the cost.

## 5 Conclusions and Recommendations

Include discussions summarizing major data items in making conclusions and recommendations

# Appendix A Preliminary Risk Assessment

The Risk Assessment and all calculations should be provided as an Appendix to be referenced in the discussions above

Include all appropriate discussions regarding assumptions and methodologies used

## References

#### Note

The report should include but not be limited to the bullet items above

The main focus of this report and proposal should be to compare the 881 data to the ARAR's as laid out in the IM/IRA decision document and to background data for the alluvial ground water

The Risk Assessment should be used as supporting evidence for the proposal Treat these data as such in the discussions, conclusions, and recommendations